

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

Complaint on First-Class Mail  
Service Standards

Docket No. C2001-3

RESPONSES OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID POPKIN  
(February 19, 2003)

The United States Postal Service hereby files its responses to the following  
interrogatories of David Popkin: DBP/USPS-146(a) through (e), filed November 1, 2002.

The interrogatories are stated verbatim and are followed by the responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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Ratemaking

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February 19, 2003

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**DBP/USPS-146** Please refer to your response to DFC/USPS-GAN-62 subpart b. The response indicates that the mail from San Diego to SCF Eureka CA arrives at Eureka after traveling via SF P&DC at 03:00 on Day 2.

- (a) Confirm that the delivery standard for mail from San Diego to Eureka SCF is two days.
- (b) Confirm that the 3 AM scheduled arrival time at Eureka is later than the normal Nationwide CET for 2-day mail.
- (c) Explain why it is possible to utilize a later CET at the Eureka P&DC for mail arriving from San Diego.
- (d) Please advise the arrival time at the Eureka P&DC of the overnight mail from the Redding CA P&DC.
- (e) Please advise the arrival time at the Eureka P&DC for 2-day mail arriving from each of the other P&DC that have 2-day service for mail destinating at Eureka [Reno NV and all of the California P&DC facilities other than San Diego - provided in DFC/USPS-GAN-62 - Redding - to be provided in response to subpart d - and Eureka - does not send mail to itself]. If the mail from more than one P&DC arrives in the same truck, so indicate.

**RESPONSE:**

- (a) Confirmed.
- (b) This cannot be confirmed, as there is no such thing as a “Nationwide CET for 2-day mail” at the SCF level...only at the ADC level. Each individual SCF has its own locally determined Incoming CET, based on the size of the SCF and other local operating parameters.
- (c) Eureka CA 955 is not a “P&DC”, nor a P&DF. It is a Customer Services Facility (CSF). Please see the above response to subpart (b), as there is no “later CET” at Eureka.
- (d) 02:40.

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**RESPONSE to DBP/USPS-146 continued**

- (e) ADC Peninsula CA 941 is the Parent Destinating ADC that is responsible for working 2-Day ADC mail down to the SCF level, including that for SCF Eureka. For this reason, all the 2-Day destinating mail that is processed by the ADC should travel via the North Bay and San Francisco P&DC route cited in the earlier reply. Therefore, the Dispatch of Value (DOV) of 2-Day SCF mail coming from the ADC should be arriving on the same trip at Eureka @ 03:00.

It is appropriate to note here that in a prior interrogatory, DFC/USPS-GAN-58(g), the following question was asked:

Please discuss the extent to which the San Diego P&DC likely labels First-Class Mail destined to SCF's in ADC Sierra CA and ADC Peninsula CA to the SCF level, not the ADC level. For example, would mail destined to SCF Sacramento CA be labeled to SCF Sacramento CA, not ADC Sierra CA? Similarly, would mail destined to SCF North Bay CA be labeled to SCF North Bay CA, not ADC Peninsula CA?"

The response was as follows:

At a minimum, Pacific Area Plants sort Originating First-Class mails to the SCF level for all Pacific Area SCF destinations. Consequently, the labeling of Intra-Pacific Area First-Class Mail is to the SCF level, not the ADC level.

Since, as previously explained, all Pacific Area Plants sort Originating First-Class mails to the SCF level for all Pacific Area SCF destinations, this means that it is the intention for Intra-Area Plants, such as the San Diego-to-North Bay pair you are inquiring about, to provide a deeper depth of sort in order to bypass the ADC level.

## **CERTIFICATE OF SERVICE**

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon all parties of record in this proceeding.

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